



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

FILED

02/01/21
04:59 PM

Order Instituting Rulemaking to
Examine Electric Utility
De-Energization of Power Lines in
Dangerous Conditions.

Rulemaking 18-12-005

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ACCESS AND
FUNCTIONAL NEEDS PLAN FOR PUBLIC SAFETY POWER SHUTOFF SUPPORT
PURSUANT TO COMMISSION DECISION IN PHASE TWO OF R.18-12-005**

ANNA VALDBERG
ANDREA TOZER

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6713
Facsimile: (626) 302-6693
E-mail: Andrea.Tozer@sce.com

Dated: **February 1, 2021**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to
Examine Electric Utility
De-Energization of Power Lines in
Dangerous Conditions.

Rulemaking 18-12-005

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ACCESS AND
FUNCTIONAL NEEDS PLAN FOR PUBLIC SAFETY POWER SHUTOFF SUPPORT
PURSUANT TO COMMISSION DECISION IN PHASE TWO OF R.18-12-005**

Southern California Edison Company (SCE) hereby submits its 2021 Access and Functional Needs Plan for Public Safety Power Shutoff Support Pursuant to Commission Decision in Phase Two of R.18-12-005, attached hereto as Attachment A.

Respectfully submitted,

ANNA VALDBERG
ANDREA TOZER

/s/ Andrea Tozer

By: Andrea Tozer

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6713
Facsimile: (626) 302-6693
E-mail: Andrea.Tozer@sce.com

February 1, 2021

Attachment A



Southern California Edison's Access and Functional Needs 2021 Plan for Public Safety Power Shutoff Support Pursuant to Commission Decision in Phase Two of R.18-12-005

February 1, 2021

TABLE OF CONTENTS

I.	Introduction	1
II.	Customer Research and Feedback	3
1.	Customer Research	3
2.	Customer Feedback/Surveys	3
3.	Employee Coalition and Focus Groups	5
III.	Consultation with Interested Parties and Advisory Councils	6
1.	SCE's Consumer Advisory Panel	6
2.	Independent Living Centers.....	7
3.	2-1-1 Referral Service	7
4.	Statewide AFN Council	8
5.	CPUC Disadvantaged Communities Advisory Group (DACAG).....	9
6.	Regional Working Groups and Advisory Board	10
IV.	Customer Resiliency Programs, Rebates and Incentives for vulnerable populations	11
1.	Critical Care Battery Back-up (CCBB) Program	11
2.	Medical Baseline	12
3.	Self-Generation Incentive Program (SGIP)	13
4.	Customer Resiliency Equity Incentive Program.....	15
5.	Single-family Affordable Solar Homes (SASH).....	16
6.	Disadvantaged Community- Single-Family Affordable Solar Homes (DAC-SASH).....	17
7.	Solar On Multifamily Affordable Housing (SOMAH)	18
8.	SCE Programs Serve Low-Income Customers	19
V.	In-Event Customer Care Plans.....	21
1.	Customer Care Incident Management Team Activation and Tools	21
2.	Community Resource Centers (CRCs) & Community Crew Vehicles (CCVs).....	22
3.	Cooling Centers.....	23
4.	Resiliency Zones	23
VI.	Customer Preparedness Outreach & Community Engagement	25

1.	Marketing campaigns	25
2.	Community meetings in high fire risk areas.....	25
3.	Meetings with cities, counties and tribal governments.....	25
4.	CBO Engagement/Community Partnerships	26
5.	In-Home Health Services partnerships (IHSS)	27
VII.	In-Event PSPS Customer Communications.....	28
1.	Event Notifications.....	28
2.	In-Person Notifications for Vulnerable Populations	30
3.	Social Media	31
4.	Website	31
5.	Customer Contact Center Support	31

I. INTRODUCTION

Pursuant to the California Public Utilities Commission’s (CPUC or Commission) Decision (D.) 20-05-051, Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk (Decision),¹ Southern California Edison Company (SCE) submitted its first Access and Functional Needs (AFN) Plan for Public Safety Power Shutoff (PSPS) Support on June 1, 2020 (AFN Plan). The AFN Plan described SCE’s efforts to address the challenges people with access and functional needs (AFN²) are facing during PSPS de-energization events. Quarterly updates were submitted in 2020 on the following schedule: September 1, 2020, and December 1, 2020, providing updates on SCE’s progress to goals for the 2020 AFN Plan. SCE is submitting on February 1, 2021, its 2021 Annual AFN Plan, which lays out SCE’s current goals, for addressing the needs of its vulnerable populations during PSPS de-energization events in 2021.

As stated in SCE’s original AFN Plan submitted on June 1, 2020, SCE performed research using both internal and external data that could help identify the population and percentage of SCE’s customer base that meets the AFN definition set out in D.19-05-042. The results of that research and analysis found that nearly 80 percent of SCE’s total customer population would fall into at least one AFN category. While SCE efforts encompass most of the AFN population, in 2020 SCE focused on helping those most vulnerable. Using the information obtained through this analysis, each AFN category was assigned a vulnerability value from high to low, which aids SCE in developing customer care plans in event of a PSPS event. These category values can be aggregated for those customers with multiple types of needs. SCE recognizes that customers who rely on life support devices are those most immediately vulnerable during PSPS de-energization events, but customers with multiple simultaneous needs (*e.g.*, disabled, low-income, those relying on medical equipment, and speak a primary language other than English) are also a high priority, and in 2021 SCE is committed to expanding existing solutions and exploring new solutions for our AFN population.

SCE does not take lightly the use of PSPS to mitigate the risk of wildfires and continues to review and improve its PSPS processes and customer care activities to reduce customer impacts of PSPS. The feedback we received throughout the PSPS events in 2020, in President Batjer’s letter on January 19, 2021 and during the public CPUC meeting on January 26, 2021 echoes feedback received from customers in areas we have to improve. SCE has clearly heard similar messages from regulators, government officials, and public safety partners that it must do more to reduce the need for PSPS going forward, perform PSPS effectively when it is necessary, and communicate

¹ D. 20-05-051, which was adopted by the Commission on May 28, 2020.

² The Commission has defined AFN populations as: “individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency, or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.” D.19-05-052, pp. A6-A7.

its wildfire and PSPS-related plan, process improvements, and support programs in a clear and useful manner.

Though our efforts are expected to benefit all customers, we will continue to prioritize our improvements to serve, support and protect AFN customers.

To that end and as described in President Batjer's letter, SCE will submit a corrective action plan to the CPUC on February 12, 2021 with detailed plans for improvement. SCE will also provide regular and as-requested updates to CPUC staff of the Safety and Enforcement Division, Safety Policy Division, and Wildfire Safety Division about progress toward the corrective actions.

SCE's 2021 AFN Plan will continue to focus on identifying, communicating with, and supporting its most vulnerable customers. Specifically, SCE currently tracks the following indicators of a customer's AFN status:

- Customers enrolled in the following programs:
 - California Alternate Rates for Energy Program (CARE)
 - Family Electric Rate Assistance (FERA)
 - Medical Baseline
- Customers who receive their utility bill in an alternate format:
 - Braille
 - Large Font Bill
- Customers who self-identify to receive an in-person visit prior to disconnection for nonpayment or self-identify as having a person with a disability in the household
- Customers who have stated a language preference as other than English

SCE will continue to leverage partnerships with trusted community partners to reach these and other populations of customers within the AFN definition set out in D.19-05-042 to help amplify outreach, awareness and resiliency planning.

II. CUSTOMER RESEARCH AND FEEDBACK

1. CUSTOMER RESEARCH

SCE remains committed to understanding the unique needs of its AFN customers and finding opportunities to help enhance outreach, education, and resiliency support in advance, during and following emergency situations like PSPS events. To help ensure that we are addressing the right needs, identifying the right solutions and supporting efforts to aid these populations, SCE conducts its own research studies, gathers direct and meaningful feedback from members of the community and partners with trusted stakeholders such as community-based organizations (CBOs), independent living centers (ILCs), the Statewide AFN Advisory Council, 2-1-1 Interface, PSPS Working Groups, PSPS Advisory Board, and public agencies who represent the AFN population to better understand and address gaps where they exist with our vulnerable customers.

In 2021 SCE will launch a new research study for our AFN customers that will help us further understand the varying needs and impacts of this diverse and vulnerable population when PSPS events unfold. This study will educate and inform SCE on core activities, such as outreach and education campaigns, in-event notifications, critical support needs during de-energization, as well as post-event recovery as experienced through our AFN populations. This study will provide insights for meaningful enhancements in these areas. Further, this research study will help to influence customer care plans and future programs that will address the gaps in resiliency capabilities for AFN customers so that as PSPS events unfold, this population will have emergency plans in place that enable them to remain resilient through these events. Data gathered from this study will be used to enhance and inform the strategies for greater integration with the vulnerable population and customer programs offered by SCE for the needs of our vulnerable populations.

2. CUSTOMER FEEDBACK/SURVEYS

In 2021-22, SCE will continue to solicit feedback from its customers about PSPS-related activities to obtain insights and recommendations for enhancements to PSPS customer programs and services offered to customers. SCE plans to conduct at least five PSPS-related surveys in 2021 through multiple channels which will include surveys of our AFN population. These surveys will include the PSPS Tracker, wildfire safety community meeting feedback survey, Community Resource Centers (CRCs) and Company Crew Vehicles (CCVs) feedback survey, and In-Language Wildfire Mitigation Communications Effectiveness Pre/Post Surveys. Additional details of the customer feedback and surveys is provided below:

1. The PSPS Tracker is an annual survey conducted at the end of every wildfire season to assess customer awareness and perception of SCE's Wildfire Mitigation Plan (WMP) and PSPS events. Four customer segments are targeted: (a) de-energized customers; (b) notified but not de-energized customers; (c) de-energized but not notified customers;

and (d) customers that do not live in a high-risk fire area. The objective of the PSPS Tracker is to understand customer awareness, experience, and opinions of PSPS and how it shapes their perception of SCE.

2. Wildfire safety community meeting surveys conducted to receive feedback on their experience and information provided.
3. CRC/CCV visitation surveys conducted among customers who visited a CRC/CCV during a PSPS event to receive feedback on their experience and the resources and support provided.
4. Online survey for feedback on user experience on the SCE website to determine customer's ability to locate wildfire and PSPS related information and assessment of the information provided.
5. In-Language Wildfire Mitigation Communications Effectiveness Pre/Post Surveys that measures the communications and outreach effectiveness prior to and coincident with the wildfire seasons by prevalent language.

Information gathered through these surveys and feedback channels will be used to assist SCE in mitigating customer inconvenience and discomfort associated with PSPS and/or address challenges faced by AFN customers during those events. SCE will engage its customers and employees through research studies that will help gather meaningful feedback to influence current and new initiatives to assist our AFN populations. SCE is also considering adding customer focus groups or in-depth-interviews to gain more insight from its customer feedback, working to refine its assessments to capture more data as needed, and conducting and centralizing customer feedback.

To conduct customer outreach and community awareness in the prevalent languages, SCE is developing a web-based Multicultural Communications Resource Library. The majority of SCE's channels will provide links to this web-based library that will serve as a centralized hub for customers to find wildfire-related outreach in all prevalent languages. Most notably, this Multicultural Communications Resource Library will provide non-English speaking customers as well as SCE employees access to the library of translated radio, website, social media, digital ads, print collateral, email, direct mail, notification texts, recorded messages, and emergency alerts created in all languages (beyond English) that are prevalent in its service area. SCE has enlisted a third-party vendor to integrate its translation technology and artificial intelligence capability into SCE's website, [sce.com](https://www.sce.com), so that webpages can be established in all 19 prevalent languages.³ This work was completed in December 2020. The estimated deployment and "go live" of SCE's

³ SCE's wildfire- and PSPS-related webpages that are available in the 19 prevalent languages include: Wildfire Safety primary landing page ([sce.com/wildfire](https://www.sce.com/wildfire)), Wildfire Mitigation Efforts page ([sce.com/mitigation](https://www.sce.com/mitigation)), PSPS page ([sce.com/pssp](https://www.sce.com/pssp)), PSPS Alerts page ([sce.com/psspalerts](https://www.sce.com/psspalerts)) Fire Weather page ([sce.com/fireweather](https://www.sce.com/fireweather)), Community Meetings page, ([sce.com/wildfiresafetymeetings](https://www.sce.com/wildfiresafetymeetings)), and Customer Resources and Support page ([sce.com/wildfire/customer-resources-and-support](https://www.sce.com/wildfire/customer-resources-and-support)).

Multicultural Communications Resource Library is expected during the first quarter of 2021.

SCE will continue partnerships with stakeholders across its service area that will also be a source or channel for obtaining feedback regarding PSPS. In the following section, SCE discusses in more detail how these partnerships will also gather feedback from impacted customers for influencing improvements in customers experiences with PSPS.

3. EMPLOYEE COALITION AND FOCUS GROUPS

A key focus in 2021 will be engaging SCE employees in solutions to serve our customers. SCE will continue leading its internal PSPS Employee Coalition Group that was formed in October of 2020 to help ensure our employees remain informed about its WMP, PSPS Incident Management Team (IMT) activations, and emergency preparedness and to obtain valuable insights and feedback from their own experience of PSPS events.

Additionally, SCE will seek to engage employees who identify as AFN, have family members or friends who are within an AFN category or who provide care for a member of the AFN community. SCE will launch a series of focus groups with SCE's Employee Resource Groups (ERG), Abilities Beyond Limits and Expectations (ABLE) and Caregivers Connect, as well as with members of the PSPS Employee Coalition Group, that will aim to identify gaps and identify both the basic and more crucial needs of these populations during PSPS events. This activity will support the development of initiatives that will identify solutions to fill key gaps in our support of AFN needs. SCE believes that directly engaging employees who are members of the AFN community, or those who are providing care for them, will draw in meaningful feedback and creative solutions from an audience of customers who will challenge themselves to directly be part of the solutions to improve our customer experience during PSPS.

III. CONSULTATION WITH INTERESTED PARTIES AND ADVISORY COUNCILS

Consistent with SCE's initial AFN Plan submitted to the CPUC in June 2020, SCE will continue engaging with diverse community stakeholders to conduct outreach and raise awareness about PSPS, promote resiliency preparedness for when PSPS events unfold and to gain insights on the varying and unique needs of our AFN populations. SCE's WMP outlines its strategy and objectives in reaching the broad categories of customers defined as AFN and how SCE will prioritize its customer care for those identified as AFN within its service area from 2020-2022.⁴ SCE remains committed to supporting the existing relationships with statewide and local CBOs and trusted agency partners throughout its service area and continues to expand those relationships outward to other trusted agencies that support our AFN customers.

Continuing since 2018, SCE participates in twice weekly meetings with the other Investor-Owned Utilities (IOUs) and weekly/monthly with state agencies to provide real-time updates and share best practices and lessons learned on community outreach and engagement, new product development and potential future programs across the SCE service area. On the local level, SCE continues to build on existing nonprofit relationships and build new partnerships with CBOs, including faith-based and grassroots organizations in High Fire Risk Area (HFRA), prioritizing participation with CBO collaboratives with diverse member organizations serving AFN populations. In 2021, SCE will continue with its co-sponsorship of the AFN Statewide Advisory Council, as well as its role in leading and facilitating the discussions with the PSPS Working Groups and PSPS Advisory Board.

1. SCE'S CONSUMER ADVISORY PANEL

SCE has regularly engaged and consulted with members of its Consumer Advisory Panel (CAP), which meets three times per year. The CAP includes diverse community stakeholders across SCE's service areas. Members of the CAP are leaders in the nonprofit, community, and business sectors that represent various AFN and consumer groups including communities of color, veterans, disabled, LGBTQ, and low-income customers. This group includes the executive director of an ILC, which provides services and resources for persons with disabilities. For the past four years, CAP members have regularly been briefed on SCE's wildfire mitigation efforts and provided feedback that has helped shape SCE's customer service and outreach into these diverse communities.

Since the State's stay-at-home order has been in place and are continuing in 2021, SCE has and will continue to adhere to these important restrictions and will continue virtual meetings with CAP. PSPS and wildfire mitigation have been standing topics of discussions during these meetings and SCE has also introduced SCE's Climate Adaptation efforts in disadvantaged and vulnerable communities on the agendas. SCE will continue to consult and partner with CAP members who are

⁴ See SCE's 2020-2022 WMP, pp. 5-110 to 5-117.

eager to provide support in reaching AFN, in-language, and diverse communities. These activities will include virtual meetings, one-on-one engagements, and joint meetings/presentations with local stakeholders.

2. INDEPENDENT LIVING CENTERS

SCE's partnerships with the eight ILCs across its service area continues to help us assist our AFN population. The ILCs are dedicated to increasing independence, access and equal opportunity for people with disabilities, are partners in raising awareness to their clients about PSPS and the importance of building resiliency plans for when these events unfold. Collectively, these eight ILCs provide direct services to the following counties within SCE's service area: Inyo, Kern, Los Angeles, Mono, Orange, Riverside, San Bernardino, Santa Barbara and Ventura.

In support of the services offered by the ILCs to our mutual customers, and to meet the needs of the AFN populations, SCE donated a supply of portable batteries with solar charging capability to the ILCs for use in their short-term battery loan programs, which help customers remain in their homes during an outage with adequate power supply for their medical devices.

When PSPS events are forecast, SCE immediately begins notifying our ILC partners, as well as our CBOs, about the potential PSPS event. In these communications, SCE provides draft messages that can be repurposed by the partners to communicate with their clients and proactively prepare to respond to needs for portable batteries.

Some ILCs expanded their services to become CRCs in 2020 to serve the needs of vulnerable populations when PSPS events unfold. These partnerships will continue into 2021, serving a critical need within the community for people with disabilities.

SCE will continue partnering with these important agencies monthly in 2021 to raise awareness about PSPS, support resiliency planning efforts for AFN populations, communicate before, during and following PSPS events and amplify awareness of the Medical Baseline (MBL) program and program developments that serve SCE's AFN populations.

3. 2-1-1 REFERRAL SERVICE

SCE intends to continue its partnership with both local and Statewide 2-1-1 service providers. In 2020, the AFN Statewide Advisory Council recommended the Statewide 2-1-1 agencies to examine best practices within their localized 2-1-1 agencies, to assess capabilities and develop consistencies in their databases with AFN resources and referrals.

SCE has continued to work through the Statewide AFN Advisory Council to partner with the Statewide 2-1-1 agencies to bring more consistency across the state of California for the services offered to vulnerable populations during PSPS events. SCE and the other IOUs are working with 2-1-1 agencies to develop a plan to help bring more consistency across the State. SCE recognizes the important resources 2-1-1 agencies provide our vulnerable populations and recognizes the needs

for consistent offerings to support the needs of the AFN population. SCE has continued to meet with 2-1-1 to discuss a statewide solution that will offer a consistent level of support and resources to IOU customers impacted by de-energization events. Resources and services such as transportation referrals and coordination of such during events as well as connecting customers with trusted agencies in their area that offer immediate support. Additionally, partnering with 2-1-1 on outreach campaigns that support customer resiliency particularly for those who are power dependent. 2-1-1 has shared a draft proposal with the statewide IOUs in January, 2021 and have been asked to provide more details of the proposal in order to evaluate for IOU support including funding.

4. STATEWIDE AFN COUNCIL

SCE is committed to understanding the unique and diverse needs of its AFN customer populations and co-funds the Statewide AFN Advisory Council in partnership with the other California IOUs.

The AFN Advisory Council meets monthly, or more frequently, and is comprised of a diverse group of recognized CBO leaders that support the AFN population as well as members and advocates from within the AFN community. The Statewide AFN Council serves as an appropriate foundation for successfully serving its AFN customers. The AFN Council opens the dialogue to discuss unique needs of this most vulnerable population and to develop a holistic strategy on how to better serve our AFN customers. The board of the AFN Council is comprised of IOUs, state leaders (*e.g.*, Cal OES, CPUC), and statewide CBO leaders who support the AFN population.

The initial kick-off of this Advisory Council was held on June 15, 2020. The Statewide Advisory Council will aid all stakeholders in developing and executing upon meaningful strategies to serve AFN populations and provide independent expertise to help ensure that utility customer programs incorporate best practices. The Council will also help utilities and other stakeholders further develop their AFN strategies to implement robust programs that will adequately and appropriately educate, communicate with, and aid AFN populations in building resiliency for emergencies, outages, and de-energization events such as PSPS.

Some examples of feedback and observations received from the Council, not specific to SCE but inclusive of all IOUs, include:

- There has been progress around the coordination with key partnerships (*i.e.*, 2-1-1 agencies, California Foundation for Independent Living Center (CFILC), food banks, CBOs, however, more work needs to be done to be consistent with efforts across all IOUs.
- Some Council members received updates directly from Cal OES as well as from the IOUs, which made it challenging for some agencies to manage the information and subsequently socialize messaging onwards to their clients. Council members suggested they prefer to receive messages directly from the IOUs only and will discuss this situation with Cal OES independently.

- IOUs must ensure ongoing work is done before and after PSPS events to reduce the impacts from the PSPS de-energizations.
- Continue focusing on accessibility for serving vulnerable populations through CRCs and CCVs.

SCE remains committed to building upon the expertise within the AFN Advisory Council and further opportunities to serve the AFN populations across our service area.

5. CPUC DISADVANTAGED COMMUNITIES ADVISORY GROUP (DACAG)

The purpose of the Disadvantaged Communities Advisory Group (DACAG) is to review and provide advice on proposed clean energy and pollution reduction programs and determine whether those proposed programs will be effective and useful in disadvantaged communities.

Disadvantaged communities are areas throughout California that most suffer from a combination of economic, health and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes, as well as high incidence of asthma and heart disease.

Although living in a disadvantaged community does not mean that a person belongs to an AFN population, there is often overlap between these two areas and further overlap into SCE HFRAs.

The DACAG defines disadvantaged communities that should be considered when developing these programs as:⁵

- The top 25 percent of census tracts identified by CalEPA's CalEnviroScreen model (these are defined as Disadvantaged Communities),
- Low-income census tracts below 80 percent of the State or Area Median Income (SMI/AMI),
- Individual households with median household income less than 80 percent of Area Median Income (AMI),
- All tribal lands.

SCE's Vice President of Customer Service Operations serves as a sponsor from SCE for both the Statewide Advisory Council and the DACAG and joins both groups discussions periodically and as

⁵ The DACAG defines disadvantage communities in a similar manner as the equity framework that it would like to adopt. This framework would work in conjunction with the Guiding Principles of the Advisory Group set forth in the Charter of the DACAG. This framework includes topics of health and safety, access, education, financial benefits, economic development, and consumer protection as it relates to climate-related policies, bills, proceedings, requests for proposals, etc.
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/EquityFramework_GuidingPrinciples.pdf

requested. In 2021, SCE remains available to engage and partner with the DACAG on its activities for outreach, education and resiliency building for AFN populations.

6. REGIONAL WORKING GROUPS AND ADVISORY BOARD

SCE meets quarterly with the PSPS Working Groups that includes small multi-jurisdictional electric utilities, community choice aggregators (CCAs), publicly owned electric utilities, communications and water service providers, CPUC staff, tribal and local government entities, Public Safety Partners, and representatives of AFN communities. The PSPS Working Groups discuss communication strategies, information sharing, identification of critical facilities, customer care programs, strategies for supporting AFN people/communities, and contingency plans. Additionally, these forums are used to leverage lessons learned, obtain valuable feedback and discuss recommendations for improving the PSPS experience overall.

The PSPS Advisory Board includes participants from Public Safety Partners, Critical Facilities such as communications and water service providers, local and tribal government officials, business groups, non-profits, representatives of AFN and vulnerable people/communities, and academic organizations. The Advisory Board discusses area-wide de-energization and wildfire issues and provides hands-on, direct involvement and advisory functions on various aspects of PSPS de-energizations. The Advisory Board has senior-level representation from the stakeholder organizations and efforts are coordinated to ensure alignment of topics and sharing of key issues between the working groups and advisory board.

IV. CUSTOMER RESILIENCY PROGRAMS, REBATES AND INCENTIVES FOR VULNERABLE POPULATIONS

1. CRITICAL CARE BATTERY BACK-UP (CCBB) PROGRAM

In the summer of 2020, SCE launched its Critical Care Battery Back-up (CCBB) program, which provides a right-sized, fully subsidized portable back-up battery to customers identified as Critical Care, enrolled in SCE's CARE/FERA program and residing in a HFRA. Critical Care customers are those that rely on medical equipment to sustain life for at least two hours. With the goal of offering a free portable backup battery to roughly 2,500 eligible customers in 2020, SCE reached out to all eligible 'Critical Care' MBL customers (2,641) enrolled in CARE or FERA residing in an HFRA. Of the eligible customer population, 837 chose to participate and were enrolled in the CCBB Program and 721 batteries have been deployed to enrolled customers. In 2020, SCE targeted 100 percent of eligible customers but only received an enrollment rate of roughly 30 percent despite sending out letters and making up to six different calls to individual eligible customers. SCE's backup battery program started delivering batteries in summer 2020 after a multi-month delay in battery inventory due to the COVID-19 pandemic. SCE has negotiated a 3-year warranty on the batteries and developed a process to assess a customer's medical devices to size the battery according to specific needs.

In 2021, the CCBB Program is expanding its offering to eligible MBL customers (not just 'Critical Care') who are enrolled in CARE or FERA and reside in a HFRA. SCE will reach out to approximately 12,000 eligible customers (targeting outreach to 100% of population) with the assumption that only 25 percent - 30 percent of the eligible customer population will choose to enroll. Enrollment assumptions were established based on the program's prior year performance as well as a comparison of performance to similar IOU administered programs across the state. If SCE is successful in enrolling a higher percentage of customers, SCE will work to find funding and ensure all eligible customers that have interest can be enrolled and take advantage of this program. Given the increased eligible customer population, SCE will expand marketing and outreach utilizing direct mail, phone calls, email, and other channels (sce.com, social media, etc.) and will explore opportunities to work with CBOs and other agencies to help educate customers about the CCBB Program. SCE has included this expansion in its 2021 WMP. A portion of this program was also included in SCE's 2021-2023 General Rate Case.

With the expansion of this program, SCE will increase support for its vulnerable customers reliant on power for electrically operated medical devices. This program provides immediate support by safeguarding them against a medical emergency and aiding in their ability to remain resilient during de-energization events. This program specifically targets SCE's population of medically vulnerable customers who live on limited incomes and otherwise may not have the ability to

purchase a key piece of equipment to help ensure their resiliency during emergencies, such as PSPS events.

2. MEDICAL BASELINE

SCE encourages customers who require electrically operated medical equipment, or have other qualifying conditions, to sign up for the MBL program. This program provides customers with additional electricity each day at the lowest baseline rate and adds additional protections when de-energization events occur, such as PSPS or other outages, for those most vulnerable and using life saving devices.

SCE will continue to raise customer awareness about the MBL program using the following opportunities and tactics:

- SCE enhanced its MBL web page⁶ in 2020, making it more interactive and allowing customers to learn about the program, print an application, or enroll using the online application form. This page and the correlating applications are currently translated into seven languages (Spanish, Korean, Chinese, Vietnamese, Cambodian and Tagalog).
- In 2021, SCE will launch capabilities for physicians to e-sign customers MBL applications for those who choose to use the online form and have a physician's portal or email where they can directly send the application link. Enabling an online solution for customers proved valuable in 2020, when SCE saw notable increases in customer enrollments in the program. SCE anticipates that a full online experience for enrollment and physician's authentication will be made available in April 2021.
- Quarterly bill messaging raising awareness of the MBL program and directing customers to www.sce.com/medicalbaseline to learn about the program and enroll.
- Direct customer campaigns in areas identified with low enrollments.
- Conversations with customer service representatives either through SCE's contact center, social media, virtual meetings or in person at community events.
- During PSPS events, CRCs and CCVs provide information on SCE's available programs including MBL, rebates and incentives.
- Community meetings where customers are invited either in-person or virtually (when necessary to comply with COVID-19 safety protocols) include information about the MBL program and have resources online and available to assist customers with questions or enrollments.
- Partnerships with ILCs, CBOs), Faith-Based Organizations and other agencies to raise awareness of and increase enrollment in the MBL program.
- Partnering with In-Home-Health Services throughout SCE's service area on training programs for home health care workers and other social service agencies to raise

⁶ Medical Baseline Allowance page *available at* <https://www.sce.com/residential/assistance/medical-baseline>

awareness of the MBL program and make resources and collateral available for them to share with their clients.

SCE will continue to work with local offices of emergency services to share information about its most vulnerable customers as events unfold so that they are aware of the customers in their communities that may require assistance during PSPS events. The Joint IOUs have relaunched its quarterly MBL benchmarking meetings, a forum that allows the IOUs to highlight activities and share best practices in areas of outreach campaigns, awareness and enrollments to ensure alignment within the respective IOU service areas.

In 2020, the number of accounts enrolled in the MBL program increased over 2018 and 2019 enrollment. Some of this was due to the relaxed requirements for MBL enrollment due to COVID-19, when SCE temporarily removed the requirement for physicians' signatures in order to enroll in the program and temporarily halted any verifications from March 2020 through April 2021. SCE anticipates a decline in MBL enrollment once physician signature and verification requirements go back into effect following the sunset of COVID-19 protections.

Year	Total End of Year MBL Customer Accounts*	% Difference from Previous Year
2018	99,132	
2019	95,912	-3.2%
2020	109,545	14.3%

*Note: This is the number of customer accounts enrolled. A customer account may have more than one eligible person at the address that makes up the customer account.

SCE recognizes that the 2020 enrollment increases, although sizeable from prior years, is not adequate assurance that we have reached all customers who are eligible for this important program. In 2021, SCE will launch specific campaigns to increase awareness and enrollments in the MBL program. SCE will highlight this information in its Quarterly Progress reports.

3. SELF-GENERATION INCENTIVE PROGRAM (SGIP)

SCE remains committed to promoting clean energy solutions that expand the growth of distributed generation in disadvantaged communities and increase customer resiliency in HFRAs. To support this goal, the statewide SGIP has been modernized with targeted incentives for resiliency related to wildfires. The SGIP is a Statewide program that provides eligible customers with financial incentives for the installation of new qualifying technologies installed to meet all, or a portion of, the electric energy needs of a facility.

To help address the need for resiliency and better prepare our customers for outages and PSPS, SGIP offers incentives for the installation of self-generating energy storage systems designed to offset the customer's energy use and work as backup battery to provide power when an outage occurs. The eligibility requirements to qualify for these incentives differ between residential and non-residential customers and are outlined in the SGIP handbook.⁷

Residential customers must meet the following to qualify for the Equity Resiliency incentive:

1. Are located in a Tier 3 or Tier 2 HFTD or were subject to two or more discrete PSPS events prior to the date of application for SGIP incentives, and
2. Are one of the following:
 - a. Eligible for the SGIP Equity Budget; or
 - b. MBL customer; or
 - c. A customer that has notified their utility of serious illness or condition that could become life-threatening if electricity is disconnected; or
 - d. Rely on electric pump wells at their primary residence for water supplies and:
 - Demonstrate the residential household meets the income eligibility requirements required for the Equity Budget; and
 - The storage installation site is a primary residence occupied by either a homeowner or tenant; and
 - The residence is not provided water by a municipal or private utility.

Non-Residential customer eligibility requirements for the Equity Resiliency incentive are as follows:

1. Located in a Tier 3 or Tier 2 HFTD or were subject to two or more discrete PSPS events prior to the date of application for SGIP incentives, and
2. Provides critical facilities or critical infrastructure during a PSPS event to at least one community that is located at least partially in a Tier 3 or Tier 2 HFTD or were subject to two or more discrete PSPS events prior to the date of application for SGIP incentives, and
3. The community is also eligible for the equity budget (except food banks, homeless shelters, and independent living centers are exempt from this requirement); and
4. The Non-Residential customer is one of the following:
 - a) Police stations; or
 - b) Fire stations; or
 - c) Emergency response providers with the addition of tribal government providers; or
 - d) Emergency operations centers; or
 - e) 911 call centers (also referred to as Public Safety Answering Points); or

⁷ <https://www1.sce.com/wps/wcm/connect/c1939673-4e1a-4c22-a5b0-5bda3f835266/SGIPHandbook2013v1.pdf?MOD=AJPERES>

- f) Medical facilities including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities; or
- g) Public and private gas, electric, water, wastewater, or flood control facilities; or
- h) Jails and prisons; or
- i) Locations designated by the IOUs to provide assistance during PSPS events (CRCs); or
- j) Cooling centers designated by state, local or tribal governments; or
- k) Homeless shelters supported by federal, state, or local, or tribal governments; or
- l) Grocery stores, corner stores, markets and supermarkets that have average annual gross receipts of \$15 million or less as calculated at the single location applying for SGIP incentives; or
- m) Independent living centers; or
- n) Food banks.

The Resilience budget was allocated \$210 million and started in Q2 2020. Since the program started through January 22, 2021, SCE has received 1,658 applications, equating to a rated capacity of 39,202,294kW. Of the total allocated budget, \$123.4 million has been committed/paid in incentives. The incentive rate is \$1.00 per Watt hour. Currently there is \$86.9 million in funds available in this program.

4. CUSTOMER RESILIENCY EQUITY INCENTIVE PROGRAM

SCE's Customer Resiliency Equipment Incentive (CREI) program provides a financial incentive toward the cost of a microgrid control system at customer sites willing to provide temporary shelter to surrounding communities. SCE proposed in the 2021 General Rate Case to provide an incentive to offset the costs of a microgrid control system to customers willing to increase resiliency within HFRA. This program targets non-residential customers who already have solar generation and power storage capabilities, or will be adding such capabilities to their sites, and are willing to island and redirect the energy in the storage battery to a designated building on site for use during PSPS or other emergencies. These facilities are required to be open to the public during PSPS events or other emergencies. Most customers that have these features at their sites are larger entities such as schools, local government facilities, and large retailers.

In 2020, SCE developed a pilot based on two types of customers: 1) customers that already installed solar and storage capabilities (retrofit design) and 2) customers that have solar and are in the process of adding storage (upfront design). The purpose for the two configurations is to learn about the complexity of the islanding design, costs, and customer participation. In 2020, SCE completed the installation for one customer. By the end of 2021, SCE will complete the implementation at a second customer site. Based on the results from these pilots, SCE will design the future state for this program.

In 2020, although not specifically for customers impacted by PSPS, SCE provided approximately \$200,000 to pilot a microgrid control system at San Jacinto High School's existing resiliency

system. This microgrid will create an emergency shelter for the community in partnership with the American Red Cross. In 2021, SCE will pilot another microgrid control system at a school in Rialto, which will also serve as a CRC.

5. SINGLE-FAMILY AFFORDABLE SOLAR HOMES (SASH)

The SASH program provides qualifying single-family homeowners with access to solar technology while also providing green jobs training, employment, and community engagement opportunities. The program was enacted by CA Assembly Bill 2723, which directed that a minimum of 10 percent of California Solar Initiative funds be set aside for programs assisting low-income households in IOU service areas. Originally scheduled to finish in 2015, the SASH program has been extended to 2021. The SASH funds enabled low-income communities to become integral partners in building a sustainable solar industry. Objectives of the SASH program are to:

- Create broad community engagement for solar generation in low-income affordable housing.
- Provide education for low-income homeowners on the benefits of energy efficiency and solar technologies.
- Enroll and refer qualifying families to providers of energy efficiency services.
- Enable low-income families to access money-saving solar technologies by providing up-front incentives.
- Provide opportunities for community volunteers to participate and for public-private partnerships supporting low-income communities to develop.
- Support local green-jobs training and workforce development programs by enabling job trainees to participate in solar electric system installations.

Eligible participants must meet the following criteria:

- Receive electrical service from SCE and own and live in their home,
- Have a household income that is 80 percent or less of the area median income (AMI),
- Live in a home defined as “affordable housing” by California Public Utilities Code 2852.

To promote SASH, SCE sends communications via letter and email campaigns to CARE customers in partnership with GRID Alternatives, the Program Administrator. In addition, SCE is creating a video to direct people to introduce GRID Alternatives⁸.

The SASH program was launched in November 2007. In 2020, SCE paid out approximately \$3.04 million as incentives, and the remaining incentives available is approximately \$4.2 million. This program was allocated approximately \$76.68 million through December 2021. Approximately

⁸ GRID Alternatives is a nonprofit organization based in Oakland, California that installs solar power systems and provides job training for under-served communities.

3,800 SASH applications have been completed from program inception through December 31, 2020. Incentives paid from program inception to December 31, 2020, were approximately \$58 million.

6. DISADVANTAGED COMMUNITY- SINGLE-FAMILY AFFORDABLE SOLAR HOMES (DAC-SASH)

The CPUC⁹ approved the DAC-SASH program to increase the adoption of clean, affordable solar by residential customers living in disadvantaged communities. The DAC-SASH program is expected to run through 2030 and is modeled after California's long-standing and successful SASH¹⁰ program. The CPUC has more information about solar programs for disadvantaged communities available on its website.¹¹

To qualify for the DAC-SASH Program, the Applicant must meet the following minimum requirements at the time of application submission:

- Must be a customer of SCE.
- The single-family residence must be owned, and occupied, by the Applicant as their primary residence.
- The household's total annual income must meet the income eligibility requirements for either the CARE or FERA programs.

The residence must be located in a qualified Disadvantaged Community (DAC) at the time of program application. The designation of DACs is subject to change with updates to the CalEnviroScreen tool.

The DAC-SASH program integrates job training opportunities creating ladders of opportunity for individuals from all backgrounds to access well-paid jobs in California's solar industry and ensuring lasting community impact. Objectives of the DAC-SASH program are to:

- Maximize financial savings for low-income households in economically and environmentally disadvantaged communities.
- Enhance long-term economic self-sufficiency in low-income communities by providing community members with access to green jobs training and solar employment opportunities.
- Ensure consumer protection and long-term participant benefit.
- Provide education on energy efficiency and existing programs that can provide further benefits to families.

⁹ Please visit CPUC News Blog available at <https://www.cpuc.ca.gov/cpucblog.aspx?id=6442458018&blogid=1551>. This article announces approval of the DAC-SASH program and provides a high-level overview of the program.

¹⁰ Please visit Grid Alternatives site at <https://gridalternatives.org/what-we-do/program-administration/sash> for more details about the SASH program.

¹¹ CPUC website: <https://www.cpuc.ca.gov/SolarInDACs/> lists various solar programs available to disadvantaged communities.

- Ensure robust participation and access for households in PG&E, SCE, and SDG&E service areas.

SCE helps GRID Alternatives with their communications and outreach efforts by sending letters and emails to customers to promote the program. SCE sends letters and email campaigns to CARE customers to promote the program. A revision of Grid Alternatives current marketing, education and outreach (ME&O) plan is to be filed in March 2021.

The DAC-SASH program was launched in September 2019. As of January 21, 2021, SCE had received 331 applications for the DAC-SASH program. Of the 32,831 applications, approximately \$3.2 million in incentives has been paid, reserved, or is pending approval. Current remaining budget is \$8.6 million through 2021. This program receives \$10 million annually (Statewide) through 2030.

7. SOLAR ON MULTIFAMILY AFFORDABLE HOUSING (SOMAH)

The Solar on Multifamily Affordable Housing (SOMAH) program provides financial incentives for installing photovoltaic (PV) energy systems on multifamily affordable housing. The program delivers clean power and credits on energy bills to hundreds of thousands of California's affordable housing residents.

SOMAH's unique, community-based approach ensures long-term, direct economic benefits for low-income households, helps catalyze the market for solar on multifamily housing and creates jobs while serving customers in SCE's service area.

The program is designed to be transparent and accountable to the communities it serves. It is administered by a team of nonprofit organizations, which provides a host of no-cost services to maximize participation and community benefit. Services include comprehensive technical assistance for property owners, tenant education resources and job training. A community advisory council provides input into program development and helps ensure the program maximizes benefits to communities. Objectives of the SOMAH program are to:

- Direct \$100 million, annually, from the electric IOUs' Greenhouse Gas Auction Proceeds¹² toward subsidizing solar energy systems on Multifamily affordable housing.
- Encourage development and installation of solar systems in California's disadvantaged communities¹³ across the state.

¹² CPUC Greenhouse Gas Cap-and-Trade Program: <https://www.cpuc.ca.gov/General.aspx?id=5932>

¹³ CPUC definition of disadvantage community can be found here: <https://www.cpuc.ca.gov/discom/>

- Emphasize the explicit goal that lowers the energy bills¹⁴ of tenants of low-income multifamily housing.
- Develop at least 300 megawatts of installed solar generating capacity by December 31, 2030.

CSE is currently drafting a ME&O plan for 2021 with feedback from SCE. On January 6, 2021 a meeting was held to discuss SOMAH Customer Mapping to further co-marketing opportunities with SCE. The Center for Sustainable Energy will utilize SCE Channels for communicating program through press release, SCE social media, and email blasts.

As of January 25, 2021, SCE had received 121 applications for the SOMAH program. Seventy-four applications are approved, equating to approximately \$30.2 million in approved reserved incentives. Forty-seven applications are pending reservation approval, approximately \$21.9 million in incentives. Total remaining incentives is \$150.5 million through 2021.

8. SCE PROGRAMS SERVE LOW-INCOME CUSTOMERS

SCE will continue to promote meaningful and relevant programs that offer benefits, incentives and/or services to its AFN customers. Campaigns occur throughout the year that are dedicated to individual programs, while other communications sent to customers may include highlights about programs to also raise awareness and draw customers to channels where they can learn more about the programs. Also, SCE representatives who speak with our customers also offer these programs to our valued and vulnerable customers. Some helpful programs that SCE will continue to promote are:

Energy Assistance Fund (EAF)

EAF is designed to provide a one-time assistance to SCE customers facing financial hardship.

Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP is a federally funded program that assists low-income households meet their energy needs. LIHEAP is funded by the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services.

There are several portions of the program that help eligible customers and SCE resources are trained to offer customers information regarding the LIHEAP program, including information on how to reach these agencies, so customers may seek assistance as needed. The Home Energy Assistance Program (HEAP) provides one-time financial assistance to help balance an eligible household's utility bill and the Energy Crisis Intervention Program (ECIP) provides assistance to

¹⁴ For more information on Virtual Net Metering, a tariff arrangement that enables a multi-meter property owner to allocate the property's solar system's energy credits to tenants, please visit: <https://www.cpuc.ca.gov/General.aspx?id=5408>

low-income households that are in a crisis situation. Such an example would be a household receiving a 24-48 hour disconnect notice or service termination by their utility company, as well as energy budget counseling.

In Q1 2021, SCE will launch the LIHEAP online pledge portal. The portal will allow Local Service Providers (LSP) to make financial pledges on behalf of SCE customers utilizing a convenient online portal. The portal will also provide greater transparency for data tracking and reporting related to customer pledges and LSP activity.

Income-Qualified Programs: CARE and FERA

SCE provides income-qualifying households discounted rates on their electric bill. The CARE program provides qualifying customers a discount of about 30 percent and FERA provides a discount of 18 percent on the monthly bill.

2-1-1

A free telephone number providing access to local community services. 2-1-1 is available in multiple languages, allowing those in need to access information and obtain referrals to physical and mental health resources; housing, utility, food, and employment assistance; and suicide and crisis interventions. 2-1-1 also provides disaster preparedness, response, and recovery during declared emergencies.

V. IN-EVENT CUSTOMER CARE PLANS

SCE recognizes the importance of community resources when emergency events unfold. PSPS events can sometimes impact communities for longer than other outages and can surface unique needs of the customers impacted. Events that last for up to or longer than 24 hours can limit customers' ability to charge important technology or medical devices and can impact one's ability to work or attend virtual school sessions or have equipment necessary for mobility. In 2019, SCE developed specific circuit-level customer care plans so that when PSPS events unfold SCE will know the types of customers who reside in the impacted areas. By understanding the demographics and the PSPS impacts to specific SCE service areas will allow us to plan to better respond to our customer needs through customer care plans.

1. CUSTOMER CARE INCIDENT MANAGEMENT TEAM ACTIVATION AND TOOLS

SCE's Customer Care Team plays a key role during a PSPS IMT activation including assessing potentially impacted areas, reviewing potentially affected customers, and prioritizing and optimizing available resources.

The team monitors circuit segmentation and customer data to provide informed recommendations on the deployment of customer care resources to the impacted areas. SCE's Customer Care Dashboard provides customer data, including AFN designations,¹⁵ and available resources by affected circuits. This information is used to prioritize customer care resource allocations by considering the number of customers affected, AFN populations, critical infrastructure, and impacted areas of the events.

In 2020, SCE incorporated into its Customer Care IMT a dedicated AFN resource. This position monitors notifications to our Critical Care (life support), facilitates the advance notification to SCE's ILC, CBOs and other community partners as events unfold. The AFN specialist also serves as a direct contact for these trusted partners should they have emergent client needs for which they require SCE support.

In 2021, SCE is partnering with CalOES to deliver the G197 course 'Integrating Access and Functional Needs into Emergency Management' to members of SCE's IMTs. All members of the Customer Care team and other employees who support vulnerable populations will also receive the training.

¹⁵ In addition to MBL and critical care data stored in SCE's Customer Service System, SCE has identified some segments of the AFN population with the help of a third-party vendor (Acxiom). SCE tracks and monitors the following AFN designations in our Customer Care Dashboard: Children, Critical Care, Disabled, Limited English, Low Income, Medical Baseline, and Seniors

2. COMMUNITY RESOURCE CENTERS (CRCs) & COMMUNITY CREW VEHICLES (CCVs)

During PSPS events, SCE provides in-person local support to its customers through CRCs and CCVs. These locations provide customers with information, support and resources to minimize the impact of PSPS events and provide in-person resources to assist SCE customers. CRCs and CCVs offer customers the ability to charge technology and small medical devices, access Wi-Fi or cellular service, receive water, light snacks, ice or ice vouchers to keep temperatures cool in their refrigerators, and access a safe and climate-controlled space with access to restrooms (when not limited by COVID-19-related restrictions).

Our CRC locations are required to meet all accessibility standards so that all customers, including those with disabilities, have safe and easy access to receiving these important services. Customers can find the location of activated CRCs through SCE's website (www.SCE.com) during PSPS events. Additionally, for those customers who have the need for temporary storage of medicine, some CRCs may also have refrigeration. Because SCE recognizes that its AFN population may have more unique needs than those that can be offered at typical CRCs, SCE has contracted with 8 ILCs throughout its service area to open their facilities as a CRC when events unfold. These locations are tailored to meet the needs of people with disabilities or other conditions that may require more specialized support.

In addition to CRC locations, SCE may also deploy CCVs to impacted communities. These CCVs are equipped with backup power so that they can be located within the PSPS-impacted areas and provide customers with resources to charge their personal mobile devices, receive information/updates from SCE about the event, listen for relevant public safety broadcasts, and receive resiliency supplies. Customers may also update their contact information and enroll in outage alerts at CRCs and CCVs.

In 2020, SCE increased its contracts with CRCs and can currently activate 56 of these locations across its service area in addition to deploying CCVs as needed. CRCs are activated and CCVs are dispatched to communities that are impacted by a PSPS de-energization event. When contracting with sites to host CRCs, SCE targets communities using the following factors: (1) analysis of circuit locations impacted during the prior wildfire seasons, (2) analysis of circuits likely to be impacted by PSPS events in the coming year, (3) AFN and other essential customer groups on the circuits, (4) population density, and (5) special needs within the community. Of SCE's 56 CRC locations, 43 operate between the hours of 8am-10pm.

During the COVID-19 pandemic restrictions, all CRCs and CCVs were activated in adherence to state and local social distancing requirements. Due to the COVID-19 pandemic and social distancing guidelines, some features were not always available as SCE tailored its CRCs to comply with state and local requirements. For example, space and weather permitting, SCE served customers outdoors via a drive-thru setup or an outside tent and distributed pre-packaged resiliency kits in lieu of allowing customers to directly help themselves to specific resources. Customer resiliency kits contain preparedness information including the MBL application, Personal Protective Equipment (PPE), bottled water, pre-charged phone charger, and light snacks.

In 2021, SCE will continue to focus on ways to expand and enhance services provided to customers

by hearing from customers through surveys that each visitor at a CRC or CCV is encouraged to submit.

3. COOLING CENTERS

The cooling center program runs from June 1 through October 15 each year. Cooling centers provide an air-conditioned space for residents to use during a heat wave and should a PSPS event unfold during these conditions the Cooling Centers would activate based on their contractual agreements with the Counties. These locations organically supplement our CRCs and are critical for supporting customers who have temperature sensitivity or other vulnerabilities during periods of de-energization events.

During the County and City cool center program annual kickoff events, SCE shares information regarding PSPS and other wildfire mitigation activity including opportunities to become a CRC that serves customers during PSPS events. During these meetings, SCE provides a PSPS overview as well as offer interested facilities information on how to contract as CRCs when PSPS events unfold.

4. RESILIENCY ZONES

SCE established the Resiliency Zones pilot to energize limited essential services in rural communities. For this pilot, SCE explored the creation of resiliency zones that would utilize in-front-of-the meter generation to power specific important services to continue community access to basic essential services during PSPS events, such as food, fuel, medicine, and other public safety services in remote communities. SCE identified seven remote communities as having the most frequent PSPS events in 2019 and 2020 and developed a pilot to provide up to three essential service sites (*e.g.*, grocery store, gas stations) in each Resiliency Zone community with backup generation. SCE is targeting up to three essential service sites in each of the seven communities mentioned below:

- Los Angeles County - (1) Acton, (2) Agua Dulce
- Kern County - (3) Tehachapi
- Mono County - (4) Mammoth, (5) Bridgeport / Lee Vining
- Riverside County - (6) Cabazon, (7) Idyllwild

This Resiliency Zones initiative provides customers, including our AFN population impacted by PSPS events with continued access to essential services by providing back up power to critical service sites, such as gas stations, small grocery stores (mini marts), and pharmacies. Ensuring resiliency to services like these provides aid to all customers and those who are vulnerable or residing in rural communities where access to these critical services is crucial to resiliency during PSPS events.

SCE is pursuing multiple solutions to reduce the number of PSPS-impacted customers and to provide additional support in the event of PSPS in 2021. As part of this effort, SCE believes that customer impacts could be further reduced in rural communities previously impacted by PSPS events by keeping certain essential services electrified. As such, SCE is augmenting our resiliency

programs by initiating a pilot to provide a mobile generator backup to electrify certain essential services in rural areas previously impacted by PSPS events.

For 2021, the Resiliency Zones program will continue efforts to increase customer participation and identify appropriate sites. SCE will continue to work with County and Community leaders to identify these sites. This pilot will enable SCE to assess various aspects of this program and to evaluate the benefit derived by the community with respect to energizing essential services during PSPS. If successful and the benefits support the costs, SCE may recommend expanding this program to other communities in a phased approach beginning in 2022. The mechanism for assessing benefits of the pilot will include customer feedback from impacted communities.

VI. CUSTOMER PREPAREDNESS OUTREACH & COMMUNITY ENGAGEMENT

1. MARKETING CAMPAIGNS

SCE's marketing campaign seeks to educate customers and the public on PSPS, including the conditions that trigger a PSPS, how to prepare for a PSPS, what SCE has done and continues to do to mitigate the risk of wildfires, and how to prepare for emergencies. In 2021, SCE plans to continue to run advertisements in English and other languages using a variety of channels, including digital banners, digital video, connected TV, social media, digital audio and broadcast radio. SCE also uses social media to support its marketing campaign with paid and organic posts informing customers about PSPS, emergency preparedness tips, how to sign up for PSPS alerts and storytelling around SCE's wildfire mitigation efforts. Also, information about SCE's CRCs and CCVs is shared on Facebook, Twitter, Instagram and Nextdoor.

In 2020, SCE sent the PSPS Newsletter (formerly referred to as the PSPS Dear Neighbor newsletter) to all SCE customers in both HRFAs and non-HRFAs. The newsletter sent to customers in HFRA focused on PSPS, including SCE's notification processes and decision-making factors for PSPS. The newsletter sent to customers in non-HFRA focused on emergency preparedness and included an overview of PSPS. Both versions provided an update on SCE's wildfire mitigation efforts, helpful emergency preparedness websites and ways to sign up for alerts and/or the MBL Program. In 2021, SCE plans to send another PSPS Newsletter with updated information and resources, including a list of our customer contact numbers and PSPS website pages in the 19 prevalent languages spoken in the SCE service area. We anticipate the 2021 PSPS Newsletters will be mailed to our customers in May/June 2021.

2. COMMUNITY MEETINGS IN HIGH FIRE RISK AREAS

In 2021, SCE plans to host virtual community meetings in HFRA to provide information on SCE's wildfire mitigation efforts and PSPS. The meetings will also provide information on communications and notifications around PSPS, customer programs such as the MBL program and Critical Care Backup Battery Program, and resources to help customers be better prepared. These meetings will also offer participants the opportunity to ask questions of SCE staff and provide feedback. SCE will advertise the meetings to customers in HFRA and information about the meetings will be available on SCE's website. SCE plans to record the meetings and post them with closed captioning on SCE's YouTube channel, which provides the ability for customers to view closed captioning in multiple languages.

3. MEETINGS WITH CITIES, COUNTIES AND TRIBAL GOVERNMENTS

In 2021, SCE will continue its regular engagements with local and tribal governments in its service area (primarily those with PSPS circuits located in their jurisdictions) to share and provide updates on SCE's WMP and PSPS. These meetings focus on educating and seeking feedback from local and

tribal government officials on SCE's wildfire mitigation efforts, PSPS de-energization process, how SCE communicates and works with government agencies and emergency operations during PSPS events, and assistance in promoting customer programs such as the MBL program and the Critical Care Backup Battery Program. SCE will also solicit advice on outreach to the AFN population in meetings with County Operational Areas.

4. CBO ENGAGEMENT/COMMUNITY PARTNERSHIPS

SCE engages with CBOs to help educate and create awareness around safety preparedness in the event of a disaster that impacts SCE customers, especially customers such as seniors, people with limited English proficiency, customers with disabilities, and/or those who are transportation disadvantaged.

To create even more productive alliances with CBOs, SCE used its pay-for-performance model and contracted with 50 CBOs for ongoing incentivized partnerships. These Tier-1 CBOs were selected through a Request for Proposal (RFP). The RFP was designed to select a total of 50 CBOs that have a strong reach in the communities previously mentioned and demonstrate the ability to partner with SCE to help educate and increase awareness around Wildfire and Safety Preparedness.

Together, the CBOs and SCE share information about SCE's wildfire mitigation plan and the importance of building resiliency plans for when emergencies occur. Other important topics that are regularly shared are helpful programs like MBL, CARE/FERA, rate options and important rebates and incentives available to our customers. CBOs also regularly exchange and share communications on programs and services through social media, newsletters, e-blasts, blog posts, and direct stake holder engagement efforts like digital webinars. All the Tier 1 CBOs are required to track their outreach and engagement efforts and submit this information via monthly reports. These metrics are used to evaluate CBO performance, program effectiveness, and identify areas of improvement.

For the Tier 1 CBOs to be effective in their outreach efforts, SCE provides the CBOs with the following:

- Onboarding training to provide a background on Wildfire Mitigation efforts and resources available.
- Monthly check-ins to review engagement efforts and address any challenges the CBOs may be facing.
- Quarterly webinars for all CBOs to attend and receive a refresh on programs and share additional initiatives or resources to support their outreach efforts.
- Monthly messages, CBOs will receive turnkey messaging every 5th of each month. CBOs will share this information through their communication channels. The objective is for the information to benefit their constituents and help them to prepare in the event of a wildfire.

- Tracking of community events, CBOs will provide SCE with a list of community events and SCE will post the information on SCE.com to promote these opportunities with constituents.
- Resources for engagement efforts. CBOs will have access to various digital program PDFs (in-language). In addition, if a CBO will be attending or hosting an in-person event, SCE will provide printed materials and giveaways.
- Community-Based Connection Newsletter distributed to our database of over 1,600+ CBOs. Content will cross promote customer care programs and Wildfire & Safety Information.
- In addition, SCE will continue to share message and all related program information with CBOs that submitted an RFP but were not selected as part this effort.

In 2021, SCE will continue its partnerships with trusted and reputable organizations that work directly with AFN customers. SCE will continue its partnership with Mixteco/Indigena Community Organizing Project (MICOP) to coordinate direct outreach to community members and to deliver PSPS public service announcements in the indigenous languages of Mixteco, Zapoteco and Purepecha.

SCE is also partnering with 2-1-1 service providers and ILCs throughout the service area, as noted above.

5. IN-HOME HEALTH SERVICES PARTNERSHIPS (IHSS)

In 2021, SCE will launch its partnership with IHSS to provide training to in-home health workers and other social service staff programs at SCE that are meaningful and helpful to their clients. The training program will be a virtual training with a series of events made available to the resources, likely quarterly.

The Deputy Director of IHSS and SCE will launch the first quarterly training program by end of Q2 2021 and coordinate additional quarterly trainings throughout 2021. The training will consist of in-depth overview of helpful programs that SCE offers its customers with emphasis on the MBL program. Additionally, IHSS will coordinate the distribution of collateral and attendees for the sessions using their resource information databases.

SCE and IHSS will evaluate the effectiveness of the training programs and look for opportunities throughout the year to improve this partnership where possible.

VII. IN-EVENT PSPS CUSTOMER COMMUNICATIONS

1. EVENT NOTIFICATIONS

As documented in the 2021 WMP, SCE provides PSPS event notifications pursuant to the PSPS guidelines provided by the Commission, as shown in the table below. In 2021, in response to customer feedback, SCE will conduct a comprehensive review of its notification process which may result in changes to make the notifications more effective and timely.

SCE understands its stakeholders have different needs and require varying methods of alerts and notifications. For example, first responders, Public Safety Partners, and local governments require as much lead time as practical to begin contacting constituents and preparing to respond to potential de-energizations. To support this need, SCE generally provides priority notification to these agencies between 48 to 72 hours before a potential PSPS de-energization. Additional alerts and warning update notifications are made again at 24-hour intervals with these agencies to maintain operational coordination. SCE begins initial alerts and warning messaging to remaining customers up to 48 hours in advance of a potential PSPS event. Notifications are then made to these customers in 24-hour intervals to maintain situational awareness and provide updated information regarding the ongoing potential PSPS event.

Three days ahead of a forecasted PSPS event, SCE's PSPS IMT initiates notifications, if weather conditions can be predicted this far in advance, to Public Safety Partners, Critical Infrastructure and city/state agencies in the potentially impacted area. Two days before forecast conditions are expected to impact a specific circuit, SCE's protocol dictates the initiation of notification to customers on that circuit via their preferred method of communication (e.g., text, e-mail, voice call). They are again scheduled to be notified one day before the forecasted conditions. All PSPS event notifications are delivered via phone call, email, and text (telecommunication device for the hearing impaired) formats as per the preference of the recipient. Notifications are offered in multiple languages.

Stakeholder	Initial Notification (Alert)	Update Notification (Alert)	Imminent Shut Down (Warning) ¹⁶	De-Energized (Statement)	Preparing for Re-Energization (Statement) ¹⁷	Re-Energized (Statement)	PSPS Averted (Statement)
First/ Emergency Responders/ Public Safety Partners, local governments, and tribal governments	72 hours before	48 & 24 hours before	1-4 hours before	When De-Energization Occurs	Before Re-energization Occurs	When Re-Energization Occurs	When circuits are no longer being considered for PSPS
Critical Infrastructure Providers	72 hours before	48 & 24 hours before	1-4 hours before	When De-Energization Occurs	Before Re-energization Occurs	When Re-Energization Occurs	When circuits are no longer being considered for PSPS
Customers	48 hours before	24 hours before	1-4 hours before	When De-Energization Occurs	Before Re-energization Occurs	When Re-Energization Occurs	When circuits are no longer being considered for PSPS
*SCE will target the schedule above to notify customers. Erratic or sudden onset of hazardous conditions that jeopardize public safety may impact SCE's ability to provide advanced notice to customers.							

SCE implemented the Electric Outage Notification System (EONS) in 2019 to execute high-volume targeted notifications within very short timeframes, enabling SCE to reach a large number of customers in areas potentially subject to PSPS. SCE also developed a process to utilize this technology to communicate with and support customers impacted by other types of natural disasters. In 2019, SCE enhanced EONS' capabilities to expand in-language notifications based on customer preference including Spanish, Mandarin, Cantonese, Tagalog, Vietnamese and Korean. In 2020, SCE enhanced the system further to include additional languages spoken prevalently in the SCE service area.

SCE has a comprehensive plan for communicating with its customers during emergencies, including during non-PSPS outages, which includes a schedule of notifications for repair (unplanned) outages and maintenance (planned) outages. For customers that have provided digital contacts or otherwise enrolled in the notification service, automated outbound notifications are sent to customers via the customer's preferred method of contact (including email, phone call and text message) when an outage occurs, as outage restoration times are determined or shifted, and upon conclusion of the outage. For maintenance outages, SCE provides advanced notice to customers at least three days prior to the outage, but typically sooner. SCE provides an automated reminder one day ahead of the scheduled outage and SCE's Outage Map on SCE.com provides customers with outage information in their service location.

¹⁶ SCE will make every attempt to notify customers at the 1- to 4-hour warning stage. Given the unpredictability of shifting weather during PSPS, implementation of this timeframe may vary.

¹⁷ SCE will attempt to notify customers before re-energization when possible.

In late 2019, SCE implemented zip code-level alerting for PSPS events. Zip code alerting enables non-SCE accountholder populations to enroll to receive PSPS notifications based on their preferred zip code(s) within the SCE service area. In 2021, SCE will further enhance zip code-level alerting to include in-language notifications for the current supported languages (Chinese, Vietnamese, Korean, Spanish and Tagalog). Furthermore, SCE is in discussions with technology partners to use public alert messaging to notify anyone in an area affected by a PSPS event without previously signing up for alerts on SCE.com. This capability is like “Amber Alerts” and leverages the Common Alerting Protocol technology.

2. IN-PERSON NOTIFICATIONS FOR VULNERABLE POPULATIONS

SCE takes additional measures to reach its most vulnerable customers when SCE does not receive confirmation that these customers received proactive alerts and notifications, including follow up calls and messages and up to sending a representative to attempt in person contact (door knock). In 2019 and 2020, SCE incorporated these extra cautionary steps for those customers whose physicians indicated that medical equipment is used for life support purposes. These customers are identified as SCE’s Critical Care. By the end of 2021, SCE will have expanded the additional cautionary safeguards to all MBL customers, those who self-certify as vulnerable. When a public safety event is forecasted, SCE takes additional measures to ensure that these customers are receiving the messages advising them about the PSPS event. SCE receives a report within 30 minutes of a notification campaign that provides a list of Critical Care customers whose notifications were not delivered successfully. This list is provided to SCE’s on-duty Consumer Affairs staff who begin researching the customer’s account to locate other contact channels and make attempts to reach the customer. In most cases, SCE is able to receive affirmative confirmation either through the original notice or through the process established by the Consumer Affairs department; however, in those rare instances when SCE cannot confirm the message was delivered, SCE will send a resource to the residence to attempt to deliver the message directly to the customer. If a customer is not contacted at the location, a letter is left advising of the purpose of their visit and asking that they call SCE so that they can provide an up-to-date contact preference for these critical messages. We are able to confirm that approximately ~96% of all notifications to this population, including follow up calls and door knocks, are delivered in each event.

To maintain the most current contact information in the databases, when a Consumer Affairs representative speaks with Critical Care customers, representatives update the contact preference in SCE’s databases and monitor future notifications for the current event to validate the messages have been delivered. Additionally, when field representatives who make contact at the home obtain an up-to-date contact number, they provide the information to Consumer Affairs who updates SCE’s business systems. Additionally, on an annual basis, SCE sends every customer enrolled in the MBL program a letter that talks about power outages, the importance of a resiliency plan, and asks that they contact SCE to make sure their information is up to date.

In 2021, SCE will continue with this safeguard to ensure that all customers who rely on life support are receiving PSPS alerts and notifications when SCE is able to do so. In addition, we are extending in-person notifications to all MBL customers in 2021. Unfortunately, unforeseen weather events may prevent advance notice to our customers and in such situations, SCE may not be able to reach impacted critical care customers until a de-energization has occurred.

3. SOCIAL MEDIA

In 2019, SCE began participating in the Nextdoor platform, a neighborhood online forum to exchange helpful information, goods, and services. Nextdoor currently has 2.5 to 3.0 million verified users in SCE's service area that can be targeted by region, county, city, circuit, or neighborhood. Nextdoor is also used as a channel to reach populations who may not have access to other channels or forms of communications. In 2021, SCE will enhance its Nextdoor communications to further refine our targeting capabilities and enable PSPS notifications to be delivered directly to the customers served by a specific circuit segment affected by a PSPS event.

SCE will continue customer communications via Facebook, Twitter, and Instagram responding to and triaging customer concerns during PSPS events.

4. WEBSITE

On SCE's website (SCE.com), customers can find information about SCE's wildfire mitigation efforts, learn tips for how to become more resilient during major events and receive up-to-date information regarding PSPS outages in their area. Mass media advertising, which can include television, radio, digital banners/videos and social media, directs customers to SCE.com for more information. SCE also maintains a toll-free 1-800 phone line staffed with trained personnel who receive calls from impacted customers.

SCE.com is WCAG 2.0 AA compliant. The website is routinely tested to support visitors who use a wide range of assistive technologies – including screen readers – to access the internet. Maps denoting PSPS locations and details have been optimized to support customers with visual limitations, including color blindness. In fact, in 2020 SCE recolored their PSPS outage map based directly on feedback from a Center For Accessible Technology (CFAT) representative on the AFN advisory council, which shows the impact and benefit of such advisory councils. Additionally, Wildfire/PSPS content on SCE.com is now available in nineteen languages prevalent in the service area (including English) to further assist customers with language dependency.

5. CUSTOMER CONTACT CENTER SUPPORT

SCE Customer Service Energy Advisors are trained and available to answer customer calls as a PSPS event unfolds. These representatives support our customers during PSPS events by answering

questions, providing resource information, resolving concerns, addressing emergency issues, and escalating potential issues that arise as needed.

In addition, SCE identified employees working in its Customer Contact Center that live on a HFRA circuit and could be impacted by a PSPS event. The Customer Contact Center has developed a plan to physically staff some of our call centers (during the COVID-19 pandemic while many employees are working remotely) to maintain phone resources in case employees lose power at home while they are on duty.

The Customer Contact Center has crafted Interactive Voice Response (IVR) messaging to prioritize certain calls (*e.g.*, PSPS, outages, etc.) to reduce wait times during busy PSPS events. All other calls are routed to self-serve options in the IVR or on SCE's website at SCE.com.

SCE created a new PSPS IMT role defined as the "CCC PPS Liaison." This role is activated when the PPS IMT is activated with the sole purpose of providing timely circuit status to our energy advisors so they have real-time information to share with customers seeking information and assistance.